



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 30, 2021

BY ECF AND EMAIL

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. James Thomas et al.
S3 21 Cr. 249 (SHS)

Dear Judge Stein:

On June 8, 2021, a pretrial conference was held as to defendants Duvaughn Wilson, Courtney Schloss, and James Thomas in the above-captioned matter. (Dkt. 63.) At that conference, the Court set a September 9, 2021 motions deadline and pretrial conference date. On August 4, 2021, a superseding indictment was unsealed, charging an additional six defendants in the above captioned matter. To date, five of those defendants (the "Additional Defendants") have been arrested and arraigned in magistrate court. No motions schedule has been established for the Additional Defendants. The Government now submits this letter in advance of the September 9, 2021 conference.

With the consent of defense counsel, the Government respectfully requests that the conference be adjourned for thirty-days in order to allow the parties to finalize a protective order and to produce and review discovery. The Government requests that time be excluded under the Speedy Trial Act from September 9, 2021, until the next scheduled conference date. The Government respectfully submits that the proposed exclusion would be in the interest of justice as it would allow the parties to continue to produce and review discovery as well as to engage in pretrial negotiations. Defense counsel has no objection to the exclusion of time.

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Defense Counsel for defendants Duvaughn Wilson, Courtney Schloss, and James Thomas further request a thirty-day extension to the September 9, 2021, motions deadline. (Dkt. 63.) The Government has no objection to this request.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney for the
Southern District of New York

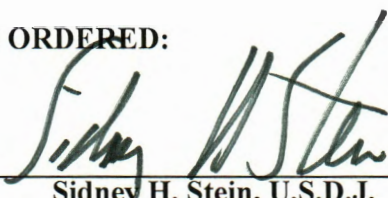
By: /s/
Ashley C. Nicolas
Matthew J. King
Assistant United States Attorneys
(212) 637-2467/2384

cc: Counsel of Record (via ECF)

The conference is adjourned to October 12, 2021, at 4:00 p.m. to give the parties time to produce and review discovery. The September 9 motion deadline is vacated. The time is excluded from calculation under the Speedy Trial Act from today until October 12, 2021. The Court finds that the ends of justice served by this continuance outweigh the best interests of the public and the defendants in a speedy trial pursuant to 18 U.S.C. Sec. 3161(h)(7)(A).

**Dated: New York, New York
August 30, 2021**

SO ORDERED:



Sidney H. Stein, U.S.D.J.